# UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN EASTERN DISTRICT-WI

U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

2019 NOV 26 P 3: 43

Plaintiff,

STEPHEN C. DRIES -CR-212

V.

Case No. 19-CR-[18 U.S.C. §§ 2252A(a)(2)(A), (b)(1), (b)(2), & (5)(B)

JUSTIN D. BULA,

**Green Bay Division** 

Defendant.

#### INDICTMENT

## COUNT ONE

## THE GRAND JURY CHARGES THAT:

1. On or about April 4, 2018, in the State and Eastern District of Wisconsin and elsewhere,

#### JUSTIN D. BULA

knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using a means and facility of interstate and foreign commerce, that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, and which contained material that had been shipped and transported by a means and facility of interstate and foreign commerce, including by computer.

The child pornography distributed by the defendant included digital images identified by the following partial file names:

<b>Partial File Names</b>	Description
A4296D	A digital image depicting a naked, prepubescent boy lying on his back with his legs slightly spread. His penis is exposed and is the focal point of the image. Positioned to the right waist area of this boy is another prepubescent boy with shoulder length blonde hair. This boy is bare chested and only his upper torso area is visible in the image. This boy has the penis of the previously described boy in his mouth. He also has his right hand positioned near the testicles of the other child.
D2798	A digital image depicting an underage boy who is approximately 5-8 years of age. This boy is positioned to the left waist area of an adult male. The lower torso area of the adult male is visible in the lower left-hand area of the image. His jeans are pulled down to his waist exposing his penis and testicles. The left hand of the adult male is positioned near the back-head area of the underage boy. The underage boy has the penis of the adult male in his mouth.

3. The defendant has a prior conviction under the laws of the State of Wisconsin related to the possession of child pornography; to wit: a conviction on October 7, 2015, in Forest County Circuit Court, for the crime of possession of child pornography.

All in violation of Title 18, United States Code, Section 2252A(a)(2)(A) & (b)(1).

## **COUNT TWO**

## THE GRAND JURY FURTHER CHARGES THAT:

1. On or about March 7, 2019, in the State and Eastern District of Wisconsin and elsewhere,

## JUSTIN D. BULA

knowingly possessed matter that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), which had been mailed, shipped, and transported using a means and facility of interstate and foreign commerce, and that was produced using materials that had been mailed, shipped, and transported by a means of interstate and foreign commerce, including by computer.

2. The child pornography possessed by the defendant included files identified by the following partial file names:

Partial File Name	Description
165.jpg	A digital image depicting a partially naked, pubescent male approximately 11-16 years of age. The minor male is wearing a green and black checkered patterned shirt that is tied in a knot near his chest exposing his bare, lower torso area. The minor male has his underwear pulled down to his upper thigh area exposing his penis and scrotum. His left hand is positioned near his left thigh and is clutching his underwear. His right arm is slightly bent, and his thumb and index finger are holding his penis.
nis.AVI	A digital video lasting approximately thirty-five seconds. Depicted in this video is a pubescent male approximately 11-16 years of age. The male is initially observed putting on a green and black checkered patterned shirt. His face is partially visible during this portion of the video. He is bottomless and his penis and scrotum are visible in the video. Seven seconds into the video, the male disappears to another area of the

Partial File Name	Description
	room. The minor male is then observed putting on red boxer style underwear with a soccer ball design. The video foeuses on the male lowering his boxers on two occasions exposing his penis and scrotum. The minor male is subsequently observed lowering his boxers exposing his buttock on two occasions.

3. The defendant has a prior conviction under the laws of the State of Wisconsin related to the possession of child pornography; to wit: a conviction on October 7, 2015, in Forest County Circuit Court, for the crime of possession of child pornography.

All in violation of Title 18, United States Code, Section 2252A(a)(5)(B) & (b)(2).

## **FORFEITURE NOTICE**

Upon conviction of either count in the indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, all visual depictions described in Title 18, United States Code, Sections 2252 and 2256, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Section 2252, and shall forfeit any property, real or personal, used or intended to be used to commit or promote the commission of such offenses.

A TRUE BILL:

TOKELLKSON

Dated: NOV. 26th, 2019

MATTHEW D. KRUEGER United States Attorney